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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DARREN ROY MACK,

Petitioner,

VS.

RENEE BAKER, et al.,

Respondents.

Case No. 3:18-cv-00324-RCJ-CLB

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME (SECOND
REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a seven (7) days enlargement of time, to and including May 18, 2020, in which to file and serve their response to Mack's petition for writ of habeas corpus.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

There has been one prior enlargement of Respondents' time to file said response, and this motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 11th day of May, 2020.

AARON D. FORD
Attorney General

By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER (Bar. No. 11543)
Deputy Solicitor General

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8 **UNITED STATES DISTRICT COURT**
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13 RENEE BAKER, et al.,

14 Respondents.

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DECLARATION OF COUNSEL

15 I, JEFFREY M. CONNER, declare under penalty of perjury:

16 1. I am an attorney employed by the Office of the Attorney General of the State of Nevada, and
17 I make this declaration on behalf of Respondents' motion for enlargement of time in the above-captioned
18 matter.

19 2. By this motion, I am requesting an enlargement of seven (7) days, to and including May 18,
20 2020, to file a response to Mack's petition for writ of habeas corpus. This is Respondents' second request
21 for an enlargement regarding this response.

22 3. Since Respondents filed their prior motion, in addition to working on this case and other
23 federal habeas matters, I was called upon to assist with drafting an expedited response to two emergency
24 writ petitions that are pending before the Nevada Supreme Court in *In re Hardesty*, No. 80836 and *In re*
25 *Board of Regents*, No. 80825. As a result, I still need additional time to complete a response to the petition.
26 Additional time will also be helpful to ensure that staff have been able to completely review and redact the
27 state court record, as required by local rules. In light of the foregoing, I need additional time to complete the
28 response to the petition. Respondents respectfully request that this Court issue an order granting

Respondents an enlargement of seven (7) days, to and including, May 18, 2020, to file the response to Mack's petition.

4. I contacted opposing counsel, William J. Routsis, II, Esq., regarding this request, and he indicated he has no objection to Respondents' request for additional time to file a response to the petition.

5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

I declare under penalty of perjury that the foregoing is true and correct.

By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER (Bar. No. 11543)
Assistant Solicitor General

IT IS HEREBY ORDERED that (ECF Nos. 30 and 31) are GRANTED.

ROBERT C. JONES
United States District Judge
Dated: May 14, 2020.